

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: David Alderfer

Debtor(s)

Freddie Mac

Movant

vs.

David Alderfer

Respondent(s)

BK NO. 22-11666 AMC

Chapter 13

Hearing Date: 10/17/2023

**OBJECTION OF FREDDIE MAC
TO CONFIRMATION OF CHAPTER 13 PLAN**

Freddie Mac (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On October 12, 2022, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$73,363.52.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$73,363.52, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Freddie Mac, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 11, 2023

By: /s/Denise Carlon

Denise Carlon, Esquire
KML Law Group, P.C.
The Lits Building
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant